

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

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*Counsel to Ad Hoc Committee of Supporting
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In re:

LTL MANAGEMENT, LLC¹,

Debtor.

Case No. 23-12825

Chapter 11

Judge: Michael B. Kaplan

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**VERIFIED STATEMENT OF PAUL HASTINGS LLP, COLE SCHOTZ P.C. AND
PARKINS & RUBIO LLP PURSUANT TO BANKRUPTCY RULE 2019**

In connection with the chapter 11 case (the “**Chapter 11 Case**”) of the above-captioned debtor in possession (the “**Debtor**”), Paul Hastings LLP (“**Paul Hastings**”), Cole Schotz P.C. (“**Cole Schotz**”) and Parkins & Rubio LLP (“**Parkins & Rubio**”, and together with Paul Hastings and Cole Schotz, “**Counsel**”) hereby submit this verified statement (the “**Verified Statement**”) pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) in connection with Counsel’s representation of the Ad Hoc Committee of Supporting Counsel (the “**AHC of Supporting Counsel**”).

1. The AHC of Supporting Counsel has formed to advance the common interests of the law firms, each of which has entered into a plan support agreement (each, a “**PSA**”) with the Debtor, Johnson & Johnson (“**J&J**”) and Johnson & Johnson Holdco (NA) Inc. (“**Holdco**”). The law firms on the AHC of Supporting Counsel contain members of the mass tort plaintiffs’ bar who have led the talc litigation for over a decade, including two former members of the Official Committee of Talc Claimants in the first bankruptcy brought by the Debtor. The AHC of Supporting Counsel’s clients include the vast majority of talc claims, and about 50% of those talc claimants with claims filed in federal and state courts.

2. Attached hereto as Exhibit A is a list of the names and addresses for each member of the AHC of Supporting Counsel and the number of clients (each a “**Client**”, and collectively the “**Clients**”) represented by each member of the AHC of Supporting Counsel. Counsel has been retained to represent the AHC of Supporting Counsel and does not represent the individual members of the AHC of Supporting Counsel or the Clients.

3. Each member of the AHC of Supporting Counsel has consented to Counsel’s representation.

4. Andres Pereira Law Firm. Attached hereto as Exhibit B-1² is a list of the full names, dates of birth, last four digits of their social security numbers, dates of death, if applicable, and information about the diseases from which each Client suffers, for each Client represented by the Andres Pereira Law Firm as of the date of this Verified Statement, together with the nature of the claim, each of which is unliquidated, held by each Client in relation to the Debtor.

5. The information set forth in Exhibit B-1 is based on information provided to the Andres Pereira Law Firm by the Andres Pereira Law Firm Clients and is intended to comply with Bankruptcy Rule 2019 and not for any other purpose.

6. Each of the Andres Pereira Law Firm Clients have signed an engagement letter with the Andres Pereira Law Firm (the “**Andres Pereira Law Firm Retainer Agreement**”). Attached hereto as Exhibit B-2 is a copy of a form of the Andres Pereira Law Firm Retainer Agreement.

7. Andrews & Thornton. Attached hereto as Exhibit C-1 is a list of the full names, dates of birth, last four digits of their social security numbers, dates of death, if applicable, and information about the diseases from which each Client suffers, for each Client represented by Andrews & Thornton as of the date of this Verified Statement, together with the nature of the claim, each of which is unliquidated, held by each Client in relation to the Debtor.

8. The information set forth in Exhibit C-1 is based on information provided to Andrews & Thornton by the Andrews & Thornton Clients and is intended to comply with Bankruptcy Rule 2019 and not for any other purpose.

² The information on the exhibits attached hereto has been redacted to protect certain personal information of the Clients. Contemporaneously herewith, the AHC of Supporting Counsel filed the *Motion of the Ad Hoc Committee of Supporting Counsel to File Under Seal and Redact Certain Information in Verified Statement of Paul Hastings LLP, Cole Schotz P.C., and Parkins & Rubio LLP Pursuant to Bankruptcy Rule 2019* seeking approval to file this redacted Verified Statement on the docket of the Chapter 11 Case.

9. Each of the Andrews & Thornton Clients have signed an engagement letter with Andrews & Thornton (the “**Andrews & Thornton Retainer Agreement**”). Attached hereto as Exhibit C-2 is a copy of a form of the Andrews & Thornton Retainer Agreement.

10. *Heninger Garrison Davis, LLC*. Attached hereto as Exhibit D-1 is a list of the full names, dates of birth, last four digits of their social security numbers, dates of death, if applicable, and information about the diseases from which each Client suffers, for each Client represented by Heninger Garrison Davis, LLC as of the date of this Verified Statement, together with the nature of the claim, each of which is unliquidated, held by each Client in relation to the Debtor.

11. The information set forth in Exhibit D-1 is based on information provided to Heninger Garrison Davis, LLC by the Heninger Garrison Davis, LLC Clients and is intended to comply with Bankruptcy Rule 2019 and not for any other purpose.

12. Each of the Heninger Garrison Davis, LLC Clients have signed an engagement letter with Heninger Garrison Davis, LLC (the “**Heninger Garrison Davis, LLC Retainer Agreement**”). Attached hereto as Exhibit D-2 is a copy of a form of the Heninger Garrison Davis, LLC Retainer Agreement.

13. *Johnson Law Group*. Attached hereto as Exhibit E-1 is a list of the full names, dates of birth, last four digits of their social security numbers, dates of death, if applicable, and information about the diseases from which each Client suffers, for each Client represented by the Johnson Law Group as of the date of this Verified Statement, together with the nature of the claim, each of which is unliquidated, held by each Client in relation to the Debtor.

14. The information set forth in Exhibit E-1 is based on information provided to the Johnson Law Group by the Johnson Law Group Clients and is intended to comply with Bankruptcy Rule 2019 and not for any other purpose.

15. Each of the Johnson Law Group Clients have signed an engagement letter with Johnson Law Group (the “**Johnson Law Group Retainer Agreement**”). Attached hereto as Exhibit E-2 is a copy of a form of the Johnson Law Group Retainer Agreement.

16. Linville Law Group. Attached hereto as Exhibit F-1 is a list of the full names, dates of birth, last four digits of their social security numbers, dates of death, if applicable, and information about the diseases from which each Client suffers, for each Client represented by the Linville Law Group as of the date of this Verified Statement, together with the nature of the claim, each of which is unliquidated, held by each Client in relation to the Debtor.

17. The information set forth in Exhibit F-1 is based on information provided to the Linville Law Group by the Linville Law Group Clients and is intended to comply with Bankruptcy Rule 2019 and not for any other purpose.

18. Each of the Linville Law Group Clients have signed an engagement letter with Linville Law Group (the “**Linville Law Group Retainer Agreement**”). Attached hereto as Exhibit F-2 is a copy of a form of the Linville Law Group Retainer Agreement.

19. McDonald Worley PC. Attached hereto as Exhibit G-1 is a list of the full names, dates of birth, last four digits of their social security numbers, dates of death, if applicable, and information about the diseases from which each Client suffers, for each Client represented by McDonald Worley PC as of the date of this Verified Statement, together with the nature of the claim, each of which is unliquidated, held by each Client in relation to the Debtor.

20. The information set forth in Exhibit G-1 is based on information provided to McDonald Worley PC by the McDonald Worley PC Clients and is intended to comply with Bankruptcy Rule 2019 and not for any other purpose.

21. Each of the McDonald Worley PC Clients have signed an engagement letter with McDonald Worley PC (the “**McDonald Worley PC Retainer Agreement**”). Attached hereto as Exhibit G-2 is a copy of a form of the McDonald Worley PC Retainer Agreement.

22. Nachawati Law Firm. Attached hereto as Exhibit H-1 is a list of the full names, dates of birth, last four digits of their social security numbers, dates of death, if applicable, and information about the diseases from which each Client suffers, for each Client represented by the Nachawati Law Firm as of the date of this Verified Statement, together with the nature of the claim, each of which is unliquidated, held by each Client in relation to the Debtor.

23. The information set forth in Exhibit H-1 is based on information provided to the Nachawati Law Firm by the Nachawati Law Firm Clients and is intended to comply with Bankruptcy Rule 2019 and not for any other purpose.

24. Each of the Nachawati Law Firm Clients have signed an engagement letter with the Nachawati Law Firm (the “**Nachawati Law Firm Retainer Agreement**”). Attached hereto as Exhibit H-2 is a copy of a form of the Nachawati Law Firm Retainer Agreement.

25. OnderLaw, LLC. Attached hereto as Exhibit I-1 is a list of the full names, dates of birth, last four digits of their social security numbers, dates of death, if applicable, and information about the diseases from which each Client suffers, for each Client represented by OnderLaw, LLC as of the date of this Verified Statement, together with the nature of the claim, each of which is unliquidated, held by each Client in relation to the Debtor.

26. The information set forth in Exhibit I-1 is based on information provided to OnderLaw, LLC by the OnderLaw, LLC Clients and is intended to comply with Bankruptcy Rule 2019 and not for any other purpose.

27. Each of the OnderLaw, LLC Clients have signed an engagement letter with OnderLaw, LLC (the “**OnderLaw, LLC Retainer Agreement**”). Attached hereto as Exhibit I-2 is a copy of a form of the OnderLaw, LLC Retainer Agreement.

28. Paul LLP. Attached hereto as Exhibit J-1 is a list of the full names, dates of birth, last four digits of their social security numbers, dates of death, if applicable, and information about the diseases from which each Client suffers, for each Client represented by Paul LLP as of the date of this Verified Statement, together with the nature of the claim, each of which is unliquidated, held by each Client in relation to the Debtor.

29. The information set forth in Exhibit J-1 is based on information provided to Paul LLP by the Paul LLP Clients and is intended to comply with Bankruptcy Rule 2019 and not for any other purpose.

30. Each of the Paul LLP Clients have signed an engagement letter with Paul LLP (the “**Paul LLP Retainer Agreement**”). Attached hereto as Exhibit J-2 is a copy of a form of the Paul LLP Retainer Agreement.

31. Pulaski Kherkher, PLLC. Attached hereto as Exhibit K-1 is a list of the full names, dates of birth, last four digits of their social security numbers, dates of death, if applicable, and information about the diseases from which each Client suffers, for each Client represented by Pulaski Kherkher, PLLC as of the date of this Verified Statement, together with the nature of the claim, each of which is unliquidated, held by each Client in relation to the Debtor.

32. The information set forth in Exhibit K-1 is based on information provided to Pulaski Kherkher, PLLC by the Pulaski Kherkher, PLLC Clients and is intended to comply with Bankruptcy Rule 2019 and not for any other purpose.

33. Each of the Pulaski Kherkher, PLLC Clients have signed an engagement letter with Pulaski Kherkher, PLLC (the “**Pulaski Kherkher, PLLC Retainer Agreement**”). Attached hereto as Exhibit K-2 is a copy of a form of the Pulaski Kherkher, PLLC Retainer Agreement.

34. Rueb Stoller Daniel (f/k/a Dalimonte Rueb, LLP). Attached hereto as Exhibit L-1 is a list of the full names, dates of birth, last four digits of their social security numbers, dates of death, if applicable, and information about the diseases from which each Client suffers, for each Client represented by Rueb Stoller Daniel (f/k/a Dalimonte Rueb, LLP) as of the date of this Verified Statement, together with the nature of the claim, each of which is unliquidated, held by each Client in relation to the Debtor.

35. The information set forth in Exhibit L-1 is based on information provided to Rueb Stoller Daniel by the Rueb Stoller Daniel Clients and is intended to comply with Bankruptcy Rule 2019 and not for any other purpose.

36. Each of the Rueb Stoller Daniel Clients have signed an engagement letter with Rueb Stoller Daniel (the “**Rueb Stoller Daniel Retainer Agreement**”). Attached hereto as Exhibit L-2 is a copy of a form of the Rueb Stoller Daniel Retainer Agreement.

37. Singleton Schreiber. Attached hereto as Exhibit M-1 is a list of the full names, dates of birth, last four digits of their social security numbers, dates of death, if applicable, and information about the diseases from which each Client suffers, for each Client represented by Singleton Schreiber as of the date of this Verified Statement, together with the nature of the claim, each of which is unliquidated, held by each Client in relation to the Debtor.

38. The information set forth in Exhibit M-1 is based on information provided to Singleton Schreiber by the Singleton Schreiber Clients and is intended to comply with Bankruptcy Rule 2019 and not for any other purpose.

39. Each of the Singleton Schreiber Clients have signed an engagement letter with Singleton Schreiber (the “**Singleton Schreiber Retainer Agreement**”). Attached hereto as Exhibit M-2 is a copy of a form of the Singleton Schreiber Retainer Agreement.

40. Slater Slater Schulman LLP. Attached hereto as Exhibit N-1 is a list of the full names, dates of birth, last four digits of their social security numbers, dates of death, if applicable, and information about the diseases from which each Client suffers, for each Client represented by Slater Slater Schulman LLP as of the date of this Verified Statement, together with the nature of the claim, each of which is unliquidated, held by each Client in relation to the Debtor.

41. The information set forth in Exhibit N-1 is based on information provided to Slater Slater Schulman LLP by the Slater Slater Schulman LLP Clients and is intended to comply with Bankruptcy Rule 2019 and not for any other purpose.

42. Each of the Slater Slater Schulman LLP Clients have signed an engagement letter with Slater Slater Schulman LLP (the “**Slater Slater Schulman LLP Retainer Agreement**”). Attached hereto as Exhibit N-2 is a copy of a form of the Slater Slater Schulman LLP Retainer Agreement.

43. Trammell PC. Attached hereto as Exhibit O-1 is a list of the full names, dates of birth, last four digits of their social security numbers, dates of death, if applicable, and information about the diseases from which each Client suffers, for each Client represented by Trammell PC as of the date of this Verified Statement, together with the nature of the claim, each of which is unliquidated, held by each Client in relation to the Debtor.

44. The information set forth in Exhibit O-1 is based on information provided to Trammell PC by the Trammell PC Clients and is intended to comply with Bankruptcy Rule 2019 and not for any other purpose.

45. Each of the Trammell PC Clients have signed an engagement letter with Trammell PC (the “**Trammell PC Retainer Agreement**”). Attached hereto as Exhibit O-2 is a copy of a form of the Trammell PC Retainer Agreement.

46. Watts Guerra LLP. Attached hereto as Exhibit P-1 is a list of the full names, dates of birth, last four digits of their social security numbers, dates of death, if applicable, and information about the diseases from which each Client suffers, for each Client represented by Watts Guerra LLP as of the date of this Verified Statement, together with the nature of the claim, each of which is unliquidated, held by each Client in relation to the Debtor.

47. The information set forth in Exhibit P-1 is based on information provided to Watts Guerra LLP by the Watts Guerra LLP Clients and is intended to comply with Bankruptcy Rule 2019 and not for any other purpose.

48. Each of the Watts Guerra LLP Clients have signed an engagement letter with Watts Guerra LLP (the “**Watts Guerra LLP Retainer Agreement**”). Attached hereto as Exhibit P-2 is a copy of a form of the Watts Guerra LLP Retainer Agreement.

49. The information contained in Exhibits A-P attached hereto is based upon information provided by the members of the AHC of Supporting Counsel to Counsel or by the Clients to the individual members of the AHC of Supporting Counsel and is subject to change.

50. As of the date of this Verified Statement, Counsel represents only the AHC of Supporting Counsel and does not represent or purport to represent any persons or entities other than the AHC of Supporting Counsel in connection with the Debtor’s Chapter 11 Case.

51. The information contained in this Verified Statement and Exhibits A-P attached hereto is intended only to comply with Bankruptcy Rule 2019 and is not intended for any other purpose. Nothing contained herein should be construed as a limitation or waiver of any rights of

any member of the AHC of Supporting Counsel or any of the Clients, including, without limitation, the right to assert, file and/or amend its claims in accordance with any applicable orders entered in this Chapter 11 Case.

52. The information contained in Exhibits A-P attached hereto is based upon information provided by the applicable members of the AHC of Supporting Counsel or the Clients. As set forth on Exhibit Q hereto, each of the members of the AHC of Supporting Counsel has executed an acknowledgement to this Verified Statement stating that the information provided herein with respect to their respective Clients is true and correct to the best of their knowledge. Counsel does not make any representation regarding the validity, amount, allowance, or priority of such claims, and reserves all rights with respect thereto. Counsel does not own, nor have they ever owned, any claims against or interests in the Debtor, except for claims for services rendered to the AHC of Supporting Counsel. The AHC of Supporting Counsel, through Counsel, reserves the right to amend and/or supplement this Verified Statement in accordance with the requirements set forth in Bankruptcy Rule 2019 at any time in the future.

Dated: May 8, 2023

COLE SCHOTZ P.C.

/s/ Michael D. Sirota

Michael D. Sirota

Warren A. Usatine

Seth Van Aalten (admitted *pro hac vice*)

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– and –

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